## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

KEVIN DAVITT, SCOTT CARTER and MARK TUDYK individually and on behalf of others similarly situated,

No. 2:13-cv-00381-MCA-JBC

Plaintiffs,

VS.

AMERICAN HONDA MOTOR CO., INC.,

Defendant.

## **DECLARATION OF TONY FITENI**

- I, Tony Fiteni, declare as follows:
- 1. I am the Claims Administration Assistant Manager for American Honda Motor Co., Inc. ("Honda"). I have held this position for 5 months. One of my responsibilities is overseeing administration of the settlement in this case.
- 2. Beginning in January 2015, Honda sent the Court-approved Class Notice and Claim Form via U.S. Mail to based on information compiled by and received from R.L. Polk. Honda mailed 792,768 Notices and Claim Forms.
- 3. Honda also established a dedicated website, <a href="http://doorlocksettlement.com">http://doorlocksettlement.com</a>, to provide settlement class members with

Agreement, key court filings, contact information for class counsel, a list of important dates, and answers to frequently asked questions are available on the website. The website also lists contact information, including a toll-free telephone number, for the Settlement Administrator; live operators are available to answer questions from potential settlement class members.

- 4. As of the date of this Declaration, Honda has received 109 requests for exclusion from potential settlement class members.
- 5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 9, 2015, in Chino, California.

Tony Fiteni